

**IN THE IOWA DISTRICT COURT IN AND FOR DUBUQUE COUNTY**

CHRISTOPHER J. MRZLAK,	)	
	)	CASE NO. 01311 LACV _____
Plaintiff,	)	
	)	
v.	)	
	)	
RENT-A-CENTER EAST, INC.,	)	
A Delaware Corporation,	)	
	)	
Defendant.	)	

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**PETITION AT LAW**

**COMES NOW** Plaintiff Christopher J. Mrzlak by and through his attorney Emilie Roth Richardson of Roth Law Office, P.C., states as follows in support of this Petition at Law:

1. Plaintiff Christopher J. Mrzlak is and was at all times hereto a resident of Galena, Jo Daviess County, Illinois.
2. Defendant Rent-A-Center East, Inc. is and was at all times here to a Delaware Corporation authorized to do business in the State of Iowa.
3. Defendant owns and operates a Rent-A-Center store in Dubuque, Iowa located at 1660 John F. Kennedy Road, Dubuque, Iowa.
4. Plaintiff was employed by Defendant at the Dubuque, Iowa store from April 2015 to July 2019. Plaintiff was the Dubuque store manager from May 2015 to July 2019.
5. On or about February 13, 2018 Plaintiff suffered a work-related injury when snow and ice fell from the roof of the building at the store causing him severe injuries.

**EXHIBIT**

6. Plaintiff pursued workers' compensation benefits as a result of the injuries he suffered on February 13, 2018. Defendant opened a workers' compensation claim with its workers' compensation carrier.

7. Plaintiff was provided medical treatment and benefits as part of the workers' compensation claim.

8. Plaintiff underwent a cervical fusion in April 2019. The surgery was a result of Plaintiff's injuries he suffered at work on February 13, 2018. Defendant approved a leave of absence for Plaintiff so he could be off from work while recovering from neck surgery.

9. Plaintiff was released back to work without restrictions and his return to work date was July 9, 2019.

10. On or about July 6, 2019, Defendant's district manager called Plaintiff and informed Plaintiff there was no job for him to return to at the Dubuque location and then told Plaintiff he could return to work at the Freeport, Illinois location as an assistant manager.

11. On or about July 6, 2019, Plaintiff was terminated from his job as store manager of the Dubuque store. Plaintiff turned in his keys on July 8, 2019.

12. Plaintiff did not accept the demotion and relocation to the Freeport, Illinois store.

13. From the time of the date of injury to the date of termination management made derogatory comments to Plaintiff about his work injury and made comments to dissuade Plaintiff from pursuing his rights under the Iowa Workers' Compensation Act.

14. Defendant terminated Plaintiff's job as store manager in retaliation for filing a workers' compensation claim.

15. Said firing is against public policy in the State of Iowa. It is the policy of the State of Iowa to ensure that all employees who seek remedies for work related injuries under the Iowa Workers' Compensation Act are protected from discrimination, retaliation, lay off, or discharge because of the exercise of the rights and/or remedies granted to them by Iowa's workers' compensation law.

16. That by reason of said termination of his employment, Plaintiff has been forced to incur economic loss.

17. That as a proximate cause of the retaliatory actions by Defendant the Plaintiff Christopher J. Mrzlak has suffered lost wages, loss of benefits, loss of future earnings, emotional distress, mental anguish, humiliation, embarrassment all to Plaintiff's detriment.

18. Defendant's conduct in their wrongful termination and retaliatory discharge of Plaintiff's employment with Defendant was in reckless and wanton disregard of his rights under Iowa law, and entitles the Plaintiff to an award of punitive damages to deter the Defendant and others from wrongful termination and retaliatory discharge in the future.

19. The damages sustained by Plaintiff are in excess of the small claims jurisdiction amount and Defendant is liable to Plaintiff for said damages.

**WHEREFORE** Plaintiff Christopher J. Mrzlak respectfully prays that this Court enter judgment against the Defendant Rent-A-Center East, Inc. and award damages, including damages for lost wages, loss of benefits, loss of future earnings, emotional distress, mental anguish, humiliation, compensatory relief, reasonable attorney fees, punitive damages and court costs with interest, as provided by law, and such other and further relief as the Court deems just and equitable.

**JURY DEMAND**

Plaintiff Christopher J. Mrzlak hereby demands a trial by jury.

CHRISTOPHER J. MRZLAK, Plaintiff;

By /s/ Emilie Roth Richardson

Emilie Roth Richardson, AT0006851

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